IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

AMDOCS (ISRAEL) LIMITED, an Israeli Corporation, Plaintiff, v. OPENET TELECOM, INC., a Delaware Corporation, and OPENET TELECOM LTD., an Irish Corporation, Defendants.	Case No. 1:10-CV-910 (LMB/TRJ) **JURY TRIAL DEMANDED**

DECLARATION OF GAOGAO WANG

I, Gaogao Wang, hereby declare as follows:

1.   I am submitting this declaration in connection with Openet's Reply Brief In Support of Its Proposed Claim Constructions and Motion for Summary Judgment.

2.   I have worked for Openet since 2005 and currently hold the position of Director of Partner Technology for Openet Telecom, Inc. Previously, I held the position of Senior Product Marketing Manager. I was deposed in this case by counsel for Amdocs on April 27, 2011.

3.   In its opposition to Openet's summary judgment motion, Amdocs attaches as exhibits excerpts of software code it contends support the infringement allegations Amdocs makes against Openet with respect to U.S. Patent No. 7,631,065. However, none of the software code identified by Amdocs demonstrates correlating or enhancing data records as claimed by the '065 patent.

4.   Exhibit 36 to Amdocs' summary judgment motion (also identified as Plaintiff's Trial Exhibit ("PX") 305 and previously marked as Exhibit 4 at my deposition)

1

is code for creating a table to store records in an Oracle (SQL) database. This code does not correlate data records. Amdocs apparently cited this code because PX 305 references a routine called "BL_WAP_CORRELATED" (see OPENET 1249706). However, this routine simply creates a table called "WAP_CORRELATED." It does not correlate the records in the table. Additional DSD code is required to correlate data records.

5.   Exhibit 37 to Amdocs' summary judgment motion (PX 310 and Wang Deposition Exhibit 8) is code that is executed the first time a data collector is connected to FusionWorks. This code initializes the collector to be able to transfer data records to FusionWorks for later processing.

6.   Exhibit 38 (PX 309 and Wang Deposition Exhibit 6) is code for defining a batch of records to be processed. In other words, this code packages a set of records into a batch file to be sent downstream. This code does not correlate the records in the batch.

7.   Exhibit 39 (PX 311 and Wang Deposition Exhibit 7) is code for initializing a procedure that checks for duplicate records to ensure, for example, that a customer is not billed twice for the same telephone call or text message.

8.   Exhibit 42 (PX 308 and Wang Deposition Exhibit 9) is code for accessing another program that process an event..

9.   Exhibit 43 (PX 301 and Wang Deposition Exhibit 10) is code for preparing an array for later use by a plug-in to FusionWorks.

10.   All of the above excerpts of code were provided to Verizon Wireless only.

11.   Exhibit 30 (PX 295 and Wang Deposition Exhibit 16) is code for collecting information on the number of times a television channel is changed. This code

does not correlate records. This code was provided to Time Warner Cable only. As such, it does not relate to an IP or packet-based network.
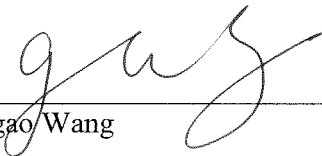
13.   Exhibit 41 (PX 312 and Wang Deposition Exhibit 17) is code for collecting instant messaging records from Yahoo Messenger. This code does not correlate records.

13.   Exhibit 44 (PX 313 and Wang Deposition Exhibit 18) works in connection with Exhibit 41 to convert the format of data records received from Yahoo Messenger into a format that can be processed by FusionWorks.

14.   Exhibits 41 and 44 were provided to AT&T only.

I declare, subject to the penalty of perjury of the laws of the United States of America, that the foregoing is to the best of my knowledge true and correct.

Date: June 29, 2011

_____
Gaogao Wang